

REMARKS

Independent claims 1, 2 and 3 have been amended. Dependent claims 8-9, 12-13, 15-17, 20, 22-24, 28-29, 35-36, 39-40 and 42 have also been amended. New dependent claims 46-48, which correspond to original dependent claims 12-14 and 39-41, have been added. New dependent claims 49-53 have also been added. Original claims 4-7, 10-11, 18-19, 21, 25-27, 30-34, 37-38 and 42-45 have been cancelled without prejudice.

Independent claims 1, 2 and 3 have each been amended to more positively recite that the apparatus is *located with* the object to be monitored. Support for this amendment is provided throughout the specification and, for example, by Figs. 1-3 and the passage on page 5 at lines 20-22.

Independent claims 1, 2 and 3, as amended, each include the feature of *textually descriptive data relating to the position of the mobile object being determined at the mobile object based on coordinate data from the position determination device*. More specifically, independent claims 1 and 3, as amended, positively recite *a database for relating coordinate data to textually descriptive data relating to the position of the mobile object*. Support for these amendments is provided at least by Figure 3 and the passages on page 6, lines 12-20 and page 9, lines 8-14 of the specification.

Independent claims 1 and 3 have been amended to include the feature of *a speech processor for generating a verbal message based on the textually descriptive data from the database*. Support for these amendments is provided at least by Figure 3 and the passages on page 6, lines 20-27 and page 9, lines 14-17 of the specification.

Dependent claims 8-9, 28-29 and 35-36 have been amended to more clearly define that a speech interpretation device for interpreting verbal commands of a user forms part of the apparatus that is *located with* the mobile object being monitored. Support for these amendments is provided at least by the passage on page 7, lines 17-25 of the specification.

Dependent claims 12, 39 and 46, as amended, recite that *the textually descriptive data comprises at least one of a street name, a suburb name, a place name and a direction of travel*. Support for these amendments is provided at least by the passages on page 6, lines 13-25 and page 9, lines 8-14 of the specification.

New dependent claims 46-48 correspond to original dependent claims 12-14. Support for new dependent claims 49, 52 and 53 is provided at least by Figure 3 and the corresponding description at page 7, lines 17-25 of the specification. Support for new dependent claims 50 and 51 is provided at least by the passage at page 5, lines 20-22 of the specification.

ARGUMENTS IN REBUTTAL

Claims 1-3 rejected under 35 U.S.C. 102(b) as being anticipated by U.S.

Patent No. 5,625,668 (Loomis).

Loomis relates to position reporting of a cellular telephone 12 and 142. A data processing facility 22 and 152 converts latitude, longitude, velocity and bearing information provided by a GPS receiver into meaningful descriptors spoken with a speech synthesizer (abstract). However, it can clearly be seen from Figures 1 and 4 that the data processing facility 22 and 152 is located remotely from the cellular telephone 12 and 142. The meaningful descriptor information is thus provided via an independent hardware platform that likely involves a third party service provider.

This is substantially different to the invention claimed in claims 1 to 3 of the present application, as amended. Here, a verbal message based on textually descriptive data relating to the position of a mobile object is generated by an apparatus located with the mobile object. This advantageously avoids the need for any third party involvement, in that users are able to interrogate the apparatus located with the mobile object directly. Reference is also made to the passage on page 1, lines 17-21 of the specification relating to the present application, which identifies systems based on a central database and/or third-party monitoring such as that disclosed in *Loomis*.

Accordingly, it is submitted that *Loomis* fails to anticipate the invention defined in claims 1 to 3 and that claims 1 to 3 are thus allowable in light of *Loomis*.

Claims 1-7, 10-27, 30-34 and 36-45 rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,918,180 (*Dimino*).

Dimino relates to a tracking system for monitoring and locating vehicles. By calling the vehicle cellular telephone from a remote location, the owner of the vehicle can hear the location of the vehicle, and then use that information to obtain its precise location (abstract). An example of the vehicle location information provided to an owner or user is given at column 7, lines 21-22 of the specification: “*For example, the audible message might be “30° latitude north, 25° longitude east”, etc.*”

At column 2, lines 19-27, *Dimino*, states: “*Essentially, the interface component of the GTS serves to convert conventional coordinate position data supplied by the GPS system into voice, i.e. spoken words, which are then played back and/or relayed back to the owner of the vehicle through the vehicle telephone. The owner can then consult look*

up tables which provide the exact location, e.g. city and cross streets, where the vehicle is currently located”.

At column 2, lines 34-37, *Dimino* states: “Some of the functions realized by the GTS unit of the invention include: remote calling of the vehicle to obtain the vehicle’s present spatial coordinates; entry of spatial coordinates into a home computer to obtain the vehicle’s location; ...”

Further, at column 2, line 55 to column 3, line 10, *Dimino* discloses an off-vehicle mapping database accessible by calling a 900 toll number to obtain data which can be used to plot the vehicle’s current position and/or movements and a roadside assistance application wherein the spatial coordinates of a vehicle are downloaded from the GTS to a central station.

It is submitted that *Dimino* fails to disclose transmission of data other than coordinate position data from the vehicle to a remote user or location. In particular, it is submitted that *Dimino* fails to disclose *generation of a verbal message based on textually descriptive data relating to coordinate data of the position of the mobile object*, as claimed in independent claims 1 to 3 of the present application, as amended.

Accordingly, it is submitted that *Dimino* fails to anticipate the invention defined in claims 1 to 3 and that claims 1 to 3 are thus allowable in light of *Dimino*. Each of the dependent claims, at least by virtue of their dependency on independent claims 1, 2 and 3 are thus also allowable.

Claims 8-9, 28-29 and 35-36 rejected under 35 U.S.C. 103(a) as being unpatentable over U.S Patent No. 5,918,180 (*Dimino*) in view of U.S. Patent No. 6,529,723 (*Bentley*).

Bentley relates to an automated system for monitoring user items and notifying a user when selected conditions occur (abstract). In the Office Action, it is stated that “*Bentley show an automated user notification system that shows it is well known to recognize user commands in a vehicle monitoring system (col. 12, ln 14-24)*”. However, careful review of the passage referred to in *Bentley* reveals that recognition or interpretation of user commands is performed by an independent data processing platform (Network Operations Center (NOC)) that is remote in location from both the user and the item being monitored. Furthermore, Figure 6 of *Bentley* clearly shows that a user accesses information relating to an item via a phone 644 and an IVR server 642 or via the World Wide Web 640 and a Web server 638. Both the IVR server 642 and the Web server 638 are hosted by the NOC.

This is in direct contrast to the invention claimed in claims 8-9, 28-29 and 35-36, which define that recognition or interpretation of user commands is performed at the mobile object being monitored. Claims 8-9 and 35-36 define that an apparatus located with the mobile object comprises a human speech interpretation device for interpreting verbal commands received from a remote user.

Based on the forgoing discussion, it is submitted that *Dimino* in view of *Bentley* fails to disclose interpretation of verbal commands from a user at the mobile object being monitored. Accordingly, it is submitted that dependent claims 8-9, 28-29 and 35-36 are not rendered unpatentable by *Dimino* in view of *Bentley* and should thus be allowable.

For all these foregoing reasons, Applicant respectfully requests entry of the foregoing amendments, reconsideration of the present application in light thereof and in light of the foregoing remarks, and then allowance of all the pending amended claims over all the prior art of record.

Respectfully submitted,

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